

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA; THE  
COMMONWEALTHS OF  
MASSACHUSETTS AND VIRGINIA; THE  
STATES OF CALIFORNIA, DELAWARE,  
CONNECTICUT, MARYLAND,  
COLORADO, FLORIDA, GEORGIA,  
ILLINOIS, INDIANA, HAWAII,  
LOUISIANA, MICHIGAN, MONTANA,  
NEW HAMPSHIRE, NEW MEXICO, NEW  
YORK, NEVADA, TENNESSEE, NEW  
JERSEY, RHODE ISLAND, OKLAHOMA,  
WISCONSIN, NORTH CAROLINA,  
MINNESOTA AND WASHINGTON, THE  
CITY OF CHICAGO AND THE DISTRICT  
OF COLUMBIA ex rel. ALLISON ZAYAS,

Plaintiff-Relator,

v.

ASTRAZENECA  
BIOPHARMACEUTICALS, INC.,  
ASTRAZENECA PLC, ASTRAZENECA LP,  
and ASTRAZENECA PHARMACEUTICALS  
LP,

Defendants.

CIVIL ACTION: 1-14-cv-01718

**JOINT STIPULATION AND MOTION FOR DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(2) and the terms of the Settlement Agreement and Mutual Release, Relator Allison Zayas (“Relator”), by and through her undersigned counsel, and Defendants AstraZeneca LP and AstraZeneca Pharmaceuticals LP (“Defendants”), by and through their undersigned counsel (collectively the “Parties”), hereby stipulate and agree that all of Relator’s claims in this action are dismissed with prejudice. The Parties further stipulate and agree that the dismissal of claims in this action shall be without prejudice as to the United States, the Plaintiff States,<sup>1</sup> and the City of Chicago.

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<sup>1</sup> The Plaintiff States in the Ninth Amended Complaint included the States or Commonwealths of California, Delaware, Florida, Georgia, Illinois, Hawaii, Indiana, Louisiana, Massachusetts, Michigan, New Mexico, Montana,

The Parties have conferred with representatives of the United States, the Plaintiff States, and the City of Chicago, and the United States, the Plaintiff States and the City of Chicago consent to the above dismissals.

WHEREFORE the Parties hereby move the Court for an order dismissing this action with prejudice as to Relator's claims against the Defendants, and without prejudice as to the United States', the Plaintiff States', and the City of Chicago's claims against the Defendants.

Dated: August 10, 2018

Respectfully submitted,

/s/ James J. Pepper

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/s/ John C. Dodds

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*Attorneys for Defendants AstraZeneca LP and  
AstraZeneca Pharmaceuticals LP*

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New Hampshire, New York, Nevada, Tennessee, Virginia, New Jersey, Rhode Island, Oklahoma, Wisconsin, North Carolina, Minnesota, Connecticut, Colorado, Maryland, Washington, and the District of Columbia.